

Local Work Instruction:**Transocean Polar Pioneer: Ballast Water Discharge – D010****Approved By:****Written By:**

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Scope:**Revised By:**

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This document offers work level instructions for the sampling, testing, and reporting associated with uncontaminated ballast water discharge while operating under the guidelines of the NPDES General Permit (AKG-28-8100), on-board the Transocean *Polar Pioneer*.

Uncontaminated ballast water consists of seawater added or removed to maintain the proper vessel stability.

RESPONSIBILITY:

The M-I SWACO NPDES Compliance Specialist is responsible for ensuring that this LWI has been provided to each person involved with this task. During active drilling operations, the M-I SWACO NPDES Compliance Specialist is responsible for performing the following tasks:

- Document the estimated flow volume.
- Perform and document visual sheen tests.
- If visual sheen tests cannot be performed, collect and document samples for static sheen tests.
- Collect and document samples for pH analysis.

1.0 References:

1.0 NPDES GP AKG-28-8100

1.0.1 Table 11 – *Effluent Limitations and Monitoring Requirements for Uncontaminated Ballast Water (D010)*

1.1 Figure – Visual Sheen Test Observation Points (Weston).

1.2 Figure – Discharge Points (Harris Pye).

1.3 Transocean Polar Pioneer Best Management Practices Plan, April 2015.

1.4 Transocean Polar Pioneer Quality Assurance Project Plan, April 2015.

1.5 M-I SWACO (or Misc.) Standard Operating Procedures: 1006, 3004, 3005, 2012, 2001, ENV001.01, TOX045.02, TOX002.65, TOX012.06, TOX014B.02, TOX043.06.

1.6 Shell Exploration & Production Company Alaska Venture 2015 Polar Pioneer Waste Management Plan.

2.0 General Requirements:

2.0 The M-I SWACO NPDES Compliance Specialist is responsible for sampling, testing, and reporting to the Shell Environmental Department all effluent discharge permit conditions while operating under the requirements of the NPDES GP AKG-28-8100. Test results, along with the estimated volumes, will be reported to the Shell Environmental Department.

- 2.1 Shell Environmental Department is responsible for maintaining and submitting to EPA the Discharge Monitoring Report (netDMR) all discharges sampling, testing and results on a monthly basis.
- 2.2 Transocean is responsible for testing, operating, and repairing of all equipment associated with this discharge.
- 2.3 Transocean is responsible for processing all ballast water contaminated with oil and grease through an oil/water separator.

3.0 Safety Guidelines:

- 3.0 Before any operations can take place, all personal involved in this process must complete the following details if required by operator or contractor:
 - 3.0.1 The Pre-Tour Meeting is when daily activities are discussed.
 - 3.0.2 Written Risk Assessment with all involved parties present.
 - 3.0.3 After Action Review, if applicable.
 - 3.0.4 Transocean Permit to Work.

4.0 Discharge / Task Description:

- 4.0 During operations, equipment and supplies will be loaded, unloaded or moved around the vessel, which changes the overall stability of the vessel. In order to maintain safe operating conditions and to ensure proper stability of the vessel, seawater is moved in and out of ballast tanks that are located throughout the pontoons.
- 4.1 Ballast water is acquired from sea chests located in the forward and aft outboard sections of both the starboard and port pontoons.
- 4.2 Transocean is responsible for determining the correct volume of ballast water to be discharged or loaded and the specific location where ballast operations are to take place.
- 4.3 The Transocean Ballast Control Operator is responsible for maintaining a running tally of all volumes taken on or discharged. This information will be provided to the M-I SWACO NPDES Compliance Specialist on a daily basis.
- 4.4 Due to this discharge occurring continuously, a visual sheen test will be conducted daily.
- 4.5 A static sheen test will be performed during low visibility conditions. Samples for the sheen test will be collected directly from the sample ports located on the appropriate discharge lines.
- 4.6 The M-I SWACO NPDES Compliance Specialist is responsible for recording all visual observations, samples, test results and volumes discharged on the NPDES Master Spreadsheet and will submit this information to the Shell Environmental Department so the data can be transferred onto the netDMR and sent to the EPA.
- 4.7 The M-I SWACO NPDES Compliance Specialist will immediately report to Shell Environmental Department at 907-830-7435, of any upset condition.
- 4.8 Convert cubic meters to gallons - 1 meter³ = 264.1721 gallons

5.0 Sampling Requirements for Uncontaminated Ballast Water (D010):

Effluent Parameter	Effluent Limitations		Monitoring Requirements	
	Average Monthly Limit	Maximum Daily Limit	Sample Frequency	Sample Type

pH	Report (s.u.)	Monthly	Grab
Free oil	No discharge	Once/discharge	Visual /Grab
Total Volume	Report (gal)	Monthly	Estimate

6.0 Clean-Up:

6.0 Follow housekeeping practices.

7.0 Contingency:

7.0 Notify Transocean Marine Department if any equipment isn't working properly.

7.1 If a discharge exceeds limitations, it will be isolated and contained until corrected.

7.2 If the automatic ballast control system fails, the Ballast Control Operator will utilize the manual leveling method to maintain proper ballast and vessel stability

7.3 Volume discharge will be estimated manual calculations.

Revision Log:

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